

JacksonLewis

Jackson Lewis P.C.
44 South Broadway, 14th Floor
White Plains NY 10601
(914) 872-8060 Main
(914) 946-1216 Fax
jacksonlewis.com

June 16, 2025

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Ortiz-Rivera v. The Trustees of Columbia University in the City of New York, et al.
Civil Action No. 1:24-cv-09919(JGK)**

Dear Judge Koeltl:

We represent Defendant The Trustees of Columbia University in the City of New York (incorrectly named in the caption as “Columbia University Irving Medical Center”). We submit this status letter jointly with Plaintiff’s counsel pursuant to Your Honor’s Order dated June 9, 2025 (Dkt. No. 17).

On May 30, 2025, the parties participated in court-ordered mediation through the SDNY mediation program. Unfortunately, we were unable to reach a resolution. In preparation for mediation the parties exchanged documents in accordance with the Pilot Discovery Protocols for Counseled Employment Cases. The parties have not yet served any document requests or interrogatories, nor have we exchanged responses to the Discovery Protocols for Employment Cases Alleging Adverse Action. We have conferred and respectfully submit the attached Joint Rule 26(f)(3) Discovery Plan.

We thank the Court for its consideration.

Respectfully submitted,

JACKSON LEWIS P.C.
44 South Broadway, 14th Floor
White Plains, New York 10601

Young & Ma LLP
445 Park Avenue, 9th Floor
New York, NY 10022

By: /s/ Susan D. Friedfel
Susan D. Friedfel
Tamara Valcin
Attorneys for Defendant

By: /s/ Tiffany Ma
Tiffany Ma
Attorneys for Plaintiff